

cannabis business. Specifically, on or about September 9, 2018, Parnas created a WhatsApp text chain between himself, “Andrey Muravyev”, Igor Fruman, Andrey Kukushkin, and [REDACTED] (the “Text Chain”).⁸ Parnas wrote: “[REDACTED], Andrey, Igor, Kukhnya. Brothers, I just wanted to introduce you to each other, and [REDACTED], if you can, get in touch with Andrey and Kuynya.” [REDACTED] responded by providing the [REDACTED] Number, and wrote, “Who should I call and at what number?” Parnas then told him to call Andrey, which appears to be a reference to Muraviev, and noted that Parnas would “send you his number and contact info momentarily.”

f. In the same Text Chain, on or about September 10, 2018, Igor Fruman sent the account details for the [REDACTED] Account, along with a photograph of [REDACTED] [REDACTED]s tax identification number.

g. On or about September 12, 2018, Correia emailed Parnas a document entitled “Cannabis Schedule and budget,” which listed a number of intended political donations across five states. The header of the document read “Schedule and Contribution Budget Cannabis Multi-State License Strategy.” The document described an effort to “schedule trips to meet with” politicians and candidates in California, Nevada, Florida, New York, and New Jersey – all states with legalized medical or recreational cannabis – and make political donations in the multi-hundred thousand dollars to support those politicians. With respect to Nevada, the document noted that trips would be scheduled to meet with “[REDACTED] [sic] (AG/next Governor), [REDACTED] [REDACTED] (LV Mayor), Clark County Officials and other relevant associates/agencies in Las Vegas, Reno and Lake Tahoe areas” and that the campaign contribution budget would be

⁸ The Text Chain is in English and Russian, the latter of which I do not speak. I have reviewed preliminary English-language translations of the Russian-language text messages in the Text Chain, and my summaries of those Russian-language text messages herein are based on those draft translations.

\$250,000. With respect to Florida, the document noted that trips would be scheduled to meet with "Rep. [REDACTED] (next Gov)" among others, and that the campaign contribution budget would be between \$250,000 and \$500,000. In total, the document projected between \$1.3 and \$2 million in political contributions. The document also included a "funding schedule," which noted that \$500,000 was "due by 9/12," an additional \$500,000 was due by October 1, 2018, and that "remaining funds TBD." For the reasons set forth below, I believe that this funding was to come from Muraviev.

h. On or about September 12, 2018, Correia forwarded the "Cannabis Schedule and Budget" document to Parnas by WhatsApp message, and Parnas replied "Perfect send to Igor." Later that day, Correia wrote "Praying for a good response from Andrey," likely referring to Muraviev. Correia subsequently wrote Parnas to ask for an in-person meeting, and noted that "I would love to be updated on things that we can't discuss over the phone."

i. Following their meeting in Las Vegas in September 2018, Kukushkin and Correia worked on behalf of the group to take steps to formalize their business arrangement. Specifically, on or about September 14, 2018, Correia emailed Kukushkin documents relating to the incorporation of a new entity. On or about September 15, 2018, in a conversation about how to structure the new company, "NewCo," Kukushkin wrote "I believe what's left was for Igor and Lev to establish who is going to be shareholder(s) of the NewCo and could we all use LLC's as our proxy's in it. I am just trying to establish core structure and how transparent should Andrey be exposed for the benefits of NewCo Transparency, his Russian roots and current political paranoia about it." Based on my review of emails pursuant to the January 18 Warrant and my participation in the investigation, I believe that Kukushkin was responding to the corporate documents Correia

had sent the day prior, and was noting the importance of concealing Muraviev's involvement in the corporation due to "his Russian roots and current political paranoia about it."

j. On or about October 1, 2018, Correia forwarded a document entitled "[REDACTED] Bylaws" to Kukushkin, and asked him to "take a look." On October 2, 2018, Kukushkin executed the "[REDACTED]" bylaws in an email confirmation to Correia. The by-laws provided that "[REDACTED]" would be incorporated in Nevada and that Kukushkin would be the president and treasurer, while Correia would be the secretary. Correia then forwarded the executed by-laws to Fruman and Parnas. Based on my participation in the investigation and my review of emails obtained pursuant to the January 18 Warrant, I believe that the "[REDACTED] Bylaws" reflected the new corporation that Kukushkin and Correia (who were the only listed parties on the corporate documents) formed to represent the business venture between Kukushkin, Correia, Parnas, Fruman, and Muraviev.

k. In late September 2018, Parnas and Correia spoke about their plans with respect to Muraviev's money. Specifically, on or about September 30, 2019, Parnas and Correia spoke about the fact that Kukushkin was going to send signed corporate documents so Correia could open a bank account, and Correia updated Parnas regarding travel that Kukushkin wanted Van Rensburg to book on his behalf. Correia closed by noting that "Then....Andrey M can wire the \$500k...." Parnas replied and directed Correia not to use their credit cards to book Kukushkin's flight. Correia sent Parnas a proposed draft text message for Kukushkin, that read:

Hey there buddy. I understand completely. However the new bank and the next \$500k is different. The original funding was for charitable donations for political donations, prior to a company being opened. Our agreement was for \$1M for 'startup' moneys. However, the next \$500,000 is for the "operationa[I]" budget, which would include general company expenses, such as your travel. Therefore our bank account needs to be open tomorrow and a new

wire for the remain[ing] \$500k needs to be sent to accommodate such expenses.”

Parnas responded, “Sounds good but confirm with Igor before you send it.”⁹

31. Based on my review of financial records, I have learned the following about the manner in which the funds from Muraviev were laundered through the [REDACTED] Account which, as described above, was provided by Igor Fruman to the group on the Text Chain:

a. [REDACTED] is an authorized signatory. On or about September 18, 2018, the [REDACTED] account received a \$500,000 wire transfer from an account held in the name of [REDACTED] Ltd. at [REDACTED], a Swiss bank, with the note “payment as per the loan agreement d.”¹⁰ Based on my review of financial records and public sources, I have learned that a similarly-named entity based in Russia is associated with Andrey Muraviev, a Russian national.

b. The day before the \$500,000 transfer from [REDACTED] Ltd., the account balance of the [REDACTED] Account was \$1,662.61.

c. The following day, on or about September 19, 2018, approximately \$494,415 of the funds in the [REDACTED] Account—most if not all of which came from [REDACTED]—were used to pay an [REDACTED] bill for a credit card in the name of [REDACTED]. As discussed infra, based on my review of records from [REDACTED], I have learned that the

⁹ Based on my review of public sources, I have learned that September 2018 was the deadline in Nevada for certain retail marijuana licenses. Nonetheless, it appears from my review of materials obtained pursuant to the May 16 Warrant that Parnas, Igor Fruman, Correia, Kukushkin, and Muraviev contemplated that their contributions and donations would aid them in changing Nevada’s rules or getting them preferential access to new licenses.

¹⁰ Based on my review of materials obtained pursuant to the May 16 Warrant, I have learned that [REDACTED] entered into a loan agreement with [REDACTED] for the amount of \$500,000, which was set to be repaid by December 31, 2018. Based on my review of available bank records for the [REDACTED] account through May 2019, it does not appear that this “loan” was ever repaid.

██████████ credit card account was used to pay for a June 12, 2018 \$50,000 contribution to ██████████ PAC in the name of "██████████," referenced above, as well as a \$15,000 contribution to the ██████████ Fund, and a \$5,400 contribution to ██████████ for Congress, all of which were also made in Igor Fruman's name. As discussed below, ██████████ was listed on the group's contribution chart. Muraviev thus appears to have funded each of these donations. The remainder of the ██████████ expenses paid by Muraviev's funding were for travel and other personal expenses. Thus, it appears that while Parnas and Fruman did use a portion of Muraviev's money to, as agreed, fund political donations and pay for travel that may be related to their venture, at least some portion of the funds appear to have been used for purposes other than what was discussed with Muraviev and Kukushkin.

32. Based on my review of emails pursuant to the January 18 Warrant, I have learned that in early October 2018, Correia circulated several documents to Parnas and Igor Fruman that appeared to be more detailed versions of his prior "Cannabis Schedule and budget" described above, which set forth the precise candidates and campaigns that Muraviev's funds would be donated to. Specifically, I have learned the following:

a. On October 8, 2018, Correia emailed Parnas and Igor Fruman a document entitled "State Campaign Contributions." In the cover email, Correia noted that the document was a draft, and that he would put it into a "final format" once "we go over these things." Correia also told Parnas and Fruman that they needed to discuss "which donations have been made" and "which are only committed." Specifically, I have learned the following with respect to the draft document:

i. The document contained a table of intended campaign contributions to support state and local candidates in New Jersey totaling \$102,500; New York totaling \$160,000; Florida totaling \$390,000; Nevada totaling \$225,000; California totaling \$120,000; and Colorado

totaling \$110,000. The total sum of intended contributions was approximately \$1.1 million, to support 25 separate candidates, who were both [REDACTED] and [REDACTED].

ii. With respect to Nevada, the chart listed intended donations of \$150,000 to support [REDACTED], and \$75,000 to support [REDACTED] a candidate for state attorney general. With respect to Florida, the chart listed an intended donation of \$250,000 to support [REDACTED], with a note that it had been made or promised on October 3, 2018.

iii. Later on October 8, 2018, Correia sent a "final draft" of the same document to Parnas and Igor Fruman. Correia wrote "Gents, please see attached. If all good. Please forward on" The document was entitled the "[REDACTED] Contribution List" and the document's header read "[REDACTED]". Specifically, the document reflected the following donations and commitments:

<i>Candidate</i>	<i>Office</i>	<i>Noted Commitment or Payment</i>	<i>Amount</i>
[REDACTED]	US. Senator (New Jersey)	Committed	\$45,000
	U.S. Rep. (New Jersey)	Paid	\$50,000
	U.S. Rep. (New Jersey)	Committed	\$15,000
	U.S. Rep. (New Jersey)	Committed	\$20,000
	U.S. Senate Candidate (New Jersey)	Committed	\$15,000
	U.S. Rep. Candidate (New Jersey)	Committed	\$15,000
	New Jersey Attorney General	Paid	\$50,000
	U.S. Senator (New York)	Paid	\$35,000
	U.S. Rep. (New York)	Committed	\$20,000
	U.S. Rep. (New York)	Committed	\$50,000
	U.S. Rep. (New York)	Committed	\$15,000
	New York Attorney General Candidate	Committed	\$40,000
	New York Attorney General Candidate	Paid	\$30,000

¹¹ Based on my review of public reporting, I have learned that [REDACTED] was at that time the attorney general of Rhode Island. Similarly, while [REDACTED] is listed as a candidate, he was in office at that time.

	New York Governor	Paid	\$125,000
	U.S. Rep. (Florida)	Paid	\$15,000
	Florida Attorney General Candidate	Committed	\$75,000
	Florida Governor Candidate	Committed	\$250,000
	U.S. Rep. (Florida)	Committed	\$50,000
	U.S. Senate Candidate (Florida)	Paid	\$100,000
	Nevada Governor Candidate	Committed	\$200,000
	Nevada Attorney General Candidate	Committed	\$50,000
	U.S. Senator (Nevada)	Paid	\$40,000
	California Attorney General Candidate	Committed	\$40,000
	California Governor Candidate	Committed	\$80,000
	U.S. Rep. (California)	Paid	\$125,000
	U.S. Rep. (Texas)	Paid	\$150,000
	PAC	Committed	\$250,000

iv. In total, the chart reflected that \$720,000 contributions had been paid, and that \$1,230,000 in commitments were outstanding, for a total projected amount of campaign contributions of \$1,950,000. Based on my review of emails obtained pursuant to the January 18 Warrant, the Text Chain, and participation in the investigation, I believe that the "[REDACTED] Contribution List" was a more detailed accounting of the campaign contributions that Parnas, Igor Fruman, and Correia intended to make, including with Muraviev's funds. "[REDACTED]" is the name of the corporation that Correia and Kukushkin formed following their meeting in Las Vegas with Parnas, Igor Fruman, and Muraviev. Moreover, from my review of material obtained pursuant to the May 16 Warrant, I have learned that on or about October 9, 2018, Igor Fruman sent the "[REDACTED] Contribution List" that Correia had prepared to Muraviev and Kukushkin via WhatsApp.

33. After receiving the [REDACTED] Contribution list, Muraviev sent an additional \$500,000 to Parnas and Igor Fruman (at [REDACTED] [REDACTED] Account) in October 2018. Specifically, based on my review of financial records, I have learned the following:

a. On or about October 16, 2018, the [REDACTED] [REDACTED] Account received a \$500,000 transfer from [REDACTED], Cyprus, from an account at the [REDACTED]. Based on my review of public sources, it appears that [REDACTED] has the same registered director, secretary, and address as [REDACTED] Cyprus. The day before the transfer, the account balance of the [REDACTED] Account was \$5,982.16. The same day that the [REDACTED] Account received the wire transfer from [REDACTED], those funds were used to pay a \$79,054 [REDACTED] credit card bill at [REDACTED], and nearly all of the remaining money was wired out to accounts controlled by Parnas and Igor Fruman.

b. Based on my review of records from [REDACTED], I have learned that the [REDACTED] credit card account was used to pay for two donations on November 1, 2018, which were made in Igor Fruman's name: \$10,000 to [REDACTED] for Nevada, and \$10,000 to [REDACTED] – Candidate for Nevada Attorney General, which are discussed below. Thus, Muraviev's money appears to have funded these donations, both of which were on the [REDACTED] Contribution List.

c. Based on my review of financial records, it appears that most of Muraviev's funds from the second wire transfer were not used for legitimate cannabis-related business expenses, but were instead used for personal expenses, other payments to consultants, and the donations to [REDACTED] and [REDACTED]. In addition, based on my review of emails obtained pursuant to the January 18 Warrant, I believe that this is the second transfer contemplated by Correia's "Cannabis Schedule

and budget” described above, which was circulated within days of the group’s Las Vegas meeting, and contemplated that funding in the amount of \$500,000 would be due on October 1, 2018.

34. Based on my review of emails obtained pursuant to the January 18 Warrant, the Text Chain, and public reporting, I have learned the following about the political activities and conversations of Parnas, Fruman, Kukushkin, Muraviev, and Correia after Muraviev made the second \$500,000 wire transfer in October 2018:

a. On or about October 19, 2018, [REDACTED] emailed [REDACTED] at the [REDACTED] National Committee, to confirm that Parnas, Igor Fruman, and Kukushkin would attend an October 20, 2018 campaign rally that featured [REDACTED] and President Trump. [REDACTED] wrote that, with respect to making a donation, “think the only problem we might run into is that our FEC lawyer has advised us not to make any contributions until this matter is resolved. But I will double check with both our lawyers and Lev to see how we should proceed.” Based on my participation in the investigation, I believe that [REDACTED] was referring to the FEC complaint filed against Fruman and Parnas, discussed above, related to the \$325,000 donation from [REDACTED] to [REDACTED].

b. On or about October 20, 2018, Kukushkin, Parnas, and Igor Fruman attended the campaign rally for [REDACTED] in Nevada.¹² Kukushkin, Parnas, and Fruman sent 10 photographs of themselves to Muraviev. The photographs depict, among other things, Kukushkin posing with [REDACTED] a candidate for Nevada state attorney general; and Kukushkin with Parnas and Igor Fruman.

¹² Based on my review of the Text Chain, it appears that [REDACTED] left the Text Chain on or about October 19, 2018, and thus did not receive any messages sent after that date.

c. On or about October 22, 2018, a member of [REDACTED] staff emailed Parnas, and noted that "[REDACTED] asked [that] I reach out and send you his W9. I have also attached his contribution form." [REDACTED] emailed [REDACTED] staff member the next day because "Lev asked me to get in touch with you regarding donations," and subsequently coordinated the donation with the staff member over the next week. [REDACTED] confirmed that the donation had been made on November 1, 2018, in the amount of \$10,000, in response to which [REDACTED] campaign staff asked if the donation was "just" the \$10,000. Based on my review of emails obtained pursuant to the January 18 Warrant, including the "[REDACTED] Contribution List," I believe that Parnas may have committed to donate \$50,000 to [REDACTED] but only donated \$10,000, which, as noted above, was funded by Muraviev.

35. Based on my review of the Text Chain, I have learned the following:

a. Following the October 20, 2018 rally, Kukushkin learned that their efforts to obtain retail licenses in Nevada were failing, including because the group had missed the September 20, 2018 application deadline,¹³ and he advocated taking additional steps to "change the rules" in order to benefit their business interests, which he noted would need the Governor's approval. As noted above, the group had donated to [REDACTED], a Nevada gubernatorial candidate.

b. Starting on or about October 30, 2018, it appears that Parnas, Igor Fruman, Kukushkin, and Muraviev had a disagreement with respect to the next steps for their business venture. Parnas complained in a text message that "[It's] very disturbing after all our talks and

¹³ Based on my review of Nevada law and information published by Nevada's Marijuana Enforcement Division, I have learned that Nevada law permits the Nevada Department of Taxation (the "DOT") to allocate recreational retail marijuana licenses. The DOT only accepts applications for recreational retail licenses during limited time periods. On July 5, 2018, the DOT announced that it would accept applications during September 7, 2018, and September 20, 2018, for a limited number of recreational retail licenses. The DOT has not held a subsequent application period since that time, and has not announced whether any additional licensing periods will open.